

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD)(FM) ECF Case
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This document relates to:

Burnett, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al., No. 03 Civ. 9849
Federal Insurance Co., et al. v. Al Qaida, et al., No. 03 Civ. 6978
Ashton, et al. v. Al Qaeda Islamic Army, et al., Case No. 02 Civ. 6977
Estate of O'Neill v. Al Baraka Investment & Development Corp., 04-CV-1923
Euro Brokers Inc., et al., v. Al Baraka, et al., No. 04 Civ. 7279
Continental Casualty Co., et al. v. Al Qaeda, et al., No. 04 Civ. 5970
Cantor Fitzgerald Associates, LP v. Akida Investment Co., Ltd., 04-CV-7065

**PLAINTIFFS' NOTICE OF MOTION FOR SANCTIONS AS TO CHARITY OFFICIAL
DEFENDANTS ABDULLAH OMAR NASEEF, ABDULLAH BIN SALEH AL OBAID,
ABDULLAH MAHSEN AL TURKI, ADNAN BASHA, AND SOLIMAN AL-BUTHE**

PLEASE TAKE NOTICE that upon the Declaration of Robert T. Haefele, Esq, and the exhibits attached thereto, and the Memorandum of Law in Support of Plaintiffs' Motion for Sanctions as to Charity Official Defendants Abdullah Omar Naseef, Abdullah bin Saleh al Obaid, Abdullah Mahsen al Turki, Adnan Basha, and Soliman al-Buthe, the plaintiffs by and through their undersigned counsel will move the Court before the Honorable Sarah Netburn, U.S. Magistrate Judge, at the United States District Court for the Southern District of New York, Thurgood Marshall Courthouse, 40 Foley Square, Room 430, Courtroom 219, at a date and time to be determined by the Court, for an Order pursuant to Federal Rule of Civil Procedure 37, sanctioning the Charity Official Defendants Abdullah Omar Naseef, Abdullah bin Saleh al Obaid, Abdullah Mahsen al Turki, Adnan Basha, and Soliman al-Buthe for their defiance of this Court's prior orders compelling them to produce their passports, to produce sworn or affirmed certifications that they had each produced all documents responsive to the plaintiffs' discovery requests, and to produce privilege logs identifying any responsive document that was not produced. Plaintiffs seek this relief for the reasons set forth in the Memorandum of Law in

Support of Plaintiffs' Motion for Sanctions as to Charity Official Defendants Abdullah Omar Naseef, Abdullah bin Saleh al Obaid, Abdullah Mahsen al Turki, Adnan Basha, and Soliman al-Buthe.

Dated: October 6, 2017

Respectfully Submitted,

/s/ Robert T. Haefele

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